

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	CASE NO. 1:18-CR-708
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
)	
v.)	
)	
KENNETH TYSON,)	<u>DEFENDANT'S UNOPPOSED MOTION</u>
)	<u>TO MODIFY BOND CONDITIONS</u>
Defendant.)	

Defendant Kenneth Tyson, through his undersigned counsel, respectfully moves for a modification of his bond conditions to permit him to travel out of the Northern District of Ohio between October 24-November 2, 2020, to assist his mother and father in relation to his father's surgery on October 26, 2020, in the Northern District of Mississippi. A memorandum in support of this Motion is attached. The Government does not oppose this Motion.

Respectfully submitted,

/s/ Chris N. Georgalis
Christos N. Georgalis (OH: 0079433)

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Attorney for Defendant Kenneth Tyson

MEMORANDUM IN SUPPORT

On December 7, 2018, this Honorable Court set an unsecured appearance bond limiting Kenneth's travel to the Northern District of Ohio. (Order Setting Conditions of Release, Doc. 5, PageID# 21.). Kenneth's father will undergo a serious medical procedure on Monday, October 26, 2020, in Oxford, Mississippi, located in the Northern District of Mississippi. Kenneth, the oldest of two children, has taken primary responsibility for assisting his aging parents with their health care needs when needed. At this time, Kenneth is needed to support and assist his parents in preparations for surgery, on surgery day, and with his father's initial recovery. Kenneth would travel to Oxford, Mississippi on October 24, 2020, and return to Cleveland, Ohio, on November 2, 2020.

Kenneth has shown compliance with similar modifications. Kenneth has previously requested, and been granted ongoing permission, to travel to the Southern District of New York, where he and his partner are under the care of a medical doctor. (Unopposed Motion to Modify Conditions of Release, Doc 28, PageID# 145.). Kenneth and his partner have traveled to New York for medical appointments in this matter pursuant to the prior Court order, with appropriate government notice, and without incident. (*See* Order [Non-Document] dated 4/4/19). Kenneth will remain compliant if granted travel for this limited purpose. AUSA Chelsea Rice has been notified of this request, and the Government has no objection to the granting of this request.

WHEREFORE, Defendant Kenneth Tyson respectfully requests an Order to permit Kenneth to travel out of the Northern District of Ohio for the purpose of assisting his mother and father in preparation for surgery, on surgery day, and with his father's initial recovery.

Respectfully submitted,

/s/ Chris N. Georgalis
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CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Chris N. Georgalis
Christos N. Georgalis

Attorney for Defendant Kenneth Tyson